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November 28, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Armstrong Digital Services, Inc. ("Armstrong")
 November 28, 2005 Compliance Letter; WC Docket No. 05-196**

Dear Ms. Dortch:

We submit this Compliance Letter on behalf of Armstrong. As an initial matter, Armstrong applauds the Commission's efforts to ensure the safety of VoIP users, and is proud to report that it is in full compliance with the Commission's E911 rules. We detail Armstrong's compliance below.

Percentage of Armstrong customers with 911 service in compliance with the Commission's Rules. We currently have 96% of our customer written acknowledgements on file.¹ One-hundred percent of our customers are routed to 911 PSAP centers as outlined below.

Routing. Armstrong properly routes its subscribers' 911 calls through the wireline 911 network by using its switch to route the calls through MCI's trunk lines to the appropriate answering points. The switch routes the calls according to the rate center.

Number of Selective Routers to which Armstrong has interconnected. Armstrong has a single Telephone Switch. All 911 calls are routed through the Switch to MCI, our interconnect partner. MCI routes the 911 calls to the appropriate PSAP via traditional 911 trunks. We currently have 35 active rate centers with our partner, MCI, and there is one Selective Router per rate center.

ANIs and registered location information. Armstrong transmits ANI and registered location information to all answering points capable of receiving and processing the information. Approximately 100% of the answering points in Armstrong's service area have such capability. These answering points serve 100% of Armstrong's VoIP subscribers.

Actions taken to obtain existing subscribers' current registered location. Armstrong has obtained registered location information from 100% of its customers. It obtains this information at the time that it installs a customer's VoIP service. Because Armstrong's VoIP service is fixed, the customer cannot move the service without contacting Armstrong first. At this time, Armstrong obtains the customer's new location information.

Methods to update registered location. If an Armstrong customer wants to relocate his or her service, the customer can use his or her VoIP service to report the location to which he or she would like Armstrong to move the VoIP service. Armstrong provides the updated location information to its third-party provider when it relocates the customer's service. Armstrong customers may only

¹ In Armstrong's October 25, 2005, Subscriber Acknowledgement Report the Company stated that it had received affirmative acknowledgements from 97% of its VoIP customers. Since filing that Report, Armstrong's subscriber base has grown by 2,000, accounting for the point decrease. As stated in the October 25, 2005, Report, the Company continues its efforts to obtain acknowledgments from its remaining VoIP customers.

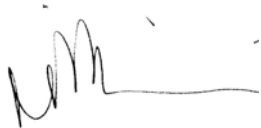
move their service within existing/served rate center boundaries. Armstrong uses the same rate center boundaries as the Incumbent Local Exchange Carriers.

Solutions for nomadic VoIP services. Armstrong has no nomadic VoIP customers and does not offer such a service. Accordingly, Armstrong has no need for any automatic detection mechanisms to identify subscribers who move VoIP equipment.

Commitment not to accept new VoIP subscribers in areas where Armstrong cannot provide 911 services. Armstrong provides 911 services in all areas in which it offers VoIP service, so this is not an issue.

If you have any further questions, please contact me.

Yours truly,

A handwritten signature in black ink, appearing to read 'N. Paolini-Subramanya', with a horizontal line extending to the right.

Nicole E. Paolini-Subramanya